

The Honorable James L. Robart  
U.S. District Court Judge

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

**JAY SCHUYLEMAN**, an individual

Plaintiff,

v.

**BARNHART CRANE AND RIGGING  
CO.**, a State of Delaware Corporation

**BARNHART CRANE AND RIGGING,  
LLC**, A State of Delaware Limited Liability  
Company, and

Defendants.

Civil Action No. 2:23-CV-00562-JLR

**[PROPOSED] ORDER GRANTING  
UNOPPOSED MOTION TO EXTEND  
DEADLINES FOR DEFENDANTS  
BARNHART CRANE AND RIGGING  
CO. AND BARNHART CRANE AND  
RIGGING, LLC TO FILE A MOTION  
FOR AN AWARD OF ATTORNEY'S  
FEES AND A MOTION FOR COSTS**

**JURY TRIAL DEMANDED**

**THIS MATTER**, having come before the Court on Defendants Barnhart Crane and Rigging Co. and Barnhart Crane and Rigging, LLC's (together, "**Barnhart**") Unopposed Motion to Extend Deadlines for Barnhart to File a Motion for an Award of Attorney's Fees and a Motion for Costs (hereinafter, the "**Motion**"), the Court having reviewed the records and files herein, and applicable law, and the Court being advised as to the foregoing, the Court **ORDERS** as follows:

Barnhart's Motion is **GRANTED**. Barnhart's Motion is not opposed by Plaintiff, and also there is "good cause" under Federal Rule of Civil Procedure ("**FRCP**") 6(b) to extend the deadlines for Barnhart to file a motion for award of attorney's fees under FRCP 54(d)(2)(B) and a motion for costs under FRCP 54(d) and LCR 54(d) because granting such relief will yield efficiencies that will result from waiting to resolve any such motion until after the ruling on any appeals are exhausted.

**NOW, THEREFORE**, the deadline for Barnhart to file a motion for attorney's fees under

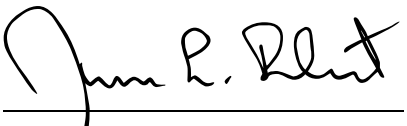
FRCP 54(d)(2) and a motion for costs under FRCP 54(d) and LCR 54(d) is extended as follows:

1. if a notice of appeal is not filed in this matter, the deadline for Barnhart to file a motion for award of attorney's fees and a motion for costs is no later than 30 days after the appeal deadline has expired, which is Tuesday, July 15, 2025; or

2. if a notice of appeal is filed in this matter, the deadline for Barnhart to file a motion for award of attorney's fees is no later than 30 days after mandate issues.

**IT IS SO ORDERED.**

**DATED** this 29th day of May, 2025.



The Honorable James L. Robert  
U.S. District Court Judge

1 DATED: May 29, 2025

2 BAKER, DONELSON, BEARMAN, CALDWELL &  
3 BERKOWITZ, PC

KLINEDINST PC

4 /s/Lea H. Speed

Gregor A. Hensrude, WSBA #45918  
1200 Fifth Avenue, Suite 1750  
Seattle, Washington 98101  
Telephone: 206-672-4400  
ghensrude@klinedinstlaw.com

5 Scott M. Douglass  
6 *Admitted Pro Hac Vice*  
sdouglass@bakerdonelson.com  
165 Madison Avenue, Suite 2000  
7 Memphis, TN 38103  
(901) 577-2258/F: (901) 577-2303

Petra N. Ambrose, WSBA #48924  
1200 Fifth Avenue, Suite 1750  
Seattle, Washington 98101  
Telephone: 206-672-4400  
pambrose@klinedinstlaw.com

8 Emily R. Billig  
9 *Admitted Pro Hac Vice*  
ebillig@bakerdonelson.com  
10 100 Light Street, Nineteenth Floor Baltimore,  
11 Maryland 21202  
(410) 685-1120/F: (410) 547-0699

*Attorneys for Defendants*  
*Barnhart Crane and Rigging Co., and*  
*Barnhart Crane and Rigging, LLC*

12 Dominic A. Rota  
13 *Admitted Pro Hac Vice*  
14 drota@bakerdonelson.com  
1600 West End Avenue, Suite 2000  
15 Nashville, TN 37203  
615-924-5634/F: (615) 726-0464

16 Lea H. Speed  
17 *Admitted Pro Hac Vice*  
18 lspeed@bakerdonelson.com  
165 Madison Avenue, Suite 2000  
19 Memphis, TN 38103  
20 (901) 577-2336/F: (901) 577-4235

21 *Attorneys for Defendants*  
22 *Barnhart Crane and Rigging Co., and*  
*Barnhart Crane and Rigging, LLC*